

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DISTRICT**

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**SHIRLEY DEAN**

**V.**

**CASE NO.: 2:25-cv-00543-ECM-CWB  
JURY TRIAL DEMANDED**

**DISMASS CHARITIES, INC., ET AL**

**EEOC COMPLAINT**

1. Plaintiff resides at 75 Joshua Circle, Elmore, AL 36025.
2. Defendants' name: Dismas Charities, Inc.
3. Location of principal office of the named defendant: 125 East Fleming Road, Montgomery, AL 36105

Nature of defendants' business: operates community correction centers/rehabilitation centers for men and women transitioning from incarceration into society.

Approximate number of individuals employed by defendants: 100

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5 (g).
4. The acts complained of in this suit concern: termination of my employment.
5. Plaintiff is not presently employed by the defendant. The dates of employment were January, 2022-November, 2023. Employment was terminated because of false allegations of assault against me.
6. Defendant's conduct is discriminatory with respect to the following: My race.

7. The names, race, sex and the position or title of the individual who allegedly discriminated against me during the period of my employment with the defendant company are:

William Hutchins  
Black  
Male  
Director

Shanieqka Manuel  
Bi-racial  
Female  
Resident Monitor

Imon Sikes  
White  
Male  
Resident Monitor

8. The alleged discrimination occurred on or about October 22, 2023.

9. The nature of my complaint, ie, the manner in which the individuals named above discriminated against me in terms of the conditions of my employment is as follows:

- William Hutchins-conspired with Shaniequa Manuel and Imon Sikes to have me terminated even after being informed by other residents that I did not assault anyone.
- Shanieqka Manuel-coerced a resident to falsely accuse me of assault.
- Imon Sikes-the step-father of Shanieqka Manuel, conspired with her to coerce a resident to falsely accuse me of assault.

10. The alleged illegal activity took place at Dimass Charities, 125 Fleming Road, Montgomery, AL 36105.

11. I filed charges for the Equal Opportunity Commission regarding defendants' alleged discriminatory conduct on or about April 23, 2025. I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. The letter was received by me on April 26, 2025.

12. I seek the following relief: recovery of back pay and any other relief as may be appropriate including injunctive orders, damages, costs and attorneys' fees.

7/21/25  
Date

*Shirley Dean*  
SHIRLEY DEAN  
75 Joshua Circle  
Elmore, AL 36025  
334/306-8205